

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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|--------------------|---|-------------------|
| In the Matter of:  | ) |                   |
|                    | ) |                   |
|                    | ) |                   |
| Broadcast Localism | ) | MB Docket No. 04- |
| 233                | ) |                   |

**COMMENTS OF EDUCATIONAL STATION WMHW**

1. The volunteers and staff of Radio station WMHW respectfully submit these comments in the above-captioned proceeding.
2. The majority of the proposals supposedly advanced to increase “localism” as outlined in the “REPORT ON BROADCAST LOCALISM AND NOTICE OF PROPOSED RULEMAKING” (“NPRM”) contain extensive recordkeeping and paperwork requirements that are a particular burden to noncommercial broadcasters, like our station which is student run. Our station is of limited financial means, and relies almost exclusively on student volunteer labor to operate. To force stations like ours to comply with the extensive requirements set out in the NPRM may well be forcing these stations to do the impossible, as we simply have no means of complying with extensive paperwork requirements. If we are forced to comply, our station may not be able to carry programming addressing community issues for

which extensive documentation is required, thereby defeating the entire purpose of the FCC's proceeding.

3. Thus, it is our opinion that, even if consideration of the majority of the proposal rules is not dropped for all radio stations, we respectfully request that Educational Stations (defined as FCC-licensed radio station, directly operated by, or affiliated with and officially sanctioned by a domestically accredited primary or secondary school, college, university or other post-secondary degree granting educational institution that is not a "public broadcasting entity" under 17 USC 118(g) ("Educational Station") with less than 5 Full Time Employees] be exempt from these proposed rules because they present unduly burdensome new requirements on educational licensed facilities with extremely limited resources such as our station.
4. Our station already serves the public by providing unique programming to our community, and information to the students of the institution with which we are affiliated. For example, "Central Beat," our weekly newsmagazine program, addresses issues not usually covered by other broadcasters in mid-Michigan and our station staff regularly present information about ongoing and upcoming events at Central Michigan University, in Mt. Pleasant and throughout the several counties of mid-Michigan..
5. Specifically, the following proposals would reduce our ability to produce programming of the sort envisioned by the NPRM due to the

amount of resources that would need to be dedicated to producing the documents and reports proposed as this work would be done by the same students who produce the programming and have limited time to commit to support our educational station.

- Enhanced Disclosure forms
- Placing our Public File on a web site
- Posting Renewal Application Pre- and Post-Filing Announcements on a web site
- Formation of and meetings with a Community Advisory Board
- Reporting Music Data and selection criteria

6. We also are particularly concerned about the proposal to require our station to maintain a physical presence during all hours of operation, which we consider to be exceptionally contrary to the goals to “promote both localism and diversity”. We rely on automation systems to air various types of “diverse” programming, including those the Commission might consider “local” (even though we fail to find a definition of this term in the NPRM) via our automation system. We simply lack the volunteers and fiscal resources to staff our studios during all hours of operations. This is especially problematical when considering that WMHW now broadcasts in HD and plans to launch an HD-2 program signal within the next few weeks. This HD-2 signal will provide

programming that is not broadcast by any other station in mid-Michigan, encouraging a return to radio listening by population segments that have been shunning radio broadcasting in favor of iPods and other personal listening devices. (Any such return to regular radio listening would vastly improve the likelihood of hearing emergency notifications via EAS and other vital information, such as Amber Alerts.) Simply put, this requirement would require our station to go off-air when we could not have someone present in the studios, thus robbing the community we serve of “local” and “diverse” programming.

7. We understand that College Broadcasters, Inc (“CBI”) will be submitting comments in this proceeding. We support those comments and incorporate them herein, by reference.

Respectfully submitted,  
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